

## NOTICE OF AMENDMENT

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

February 9, 1998

Mr. Todd K. Mann  
Vice President of Operations and Engineering  
TransMontaigne Pipeline Inc.  
280 North College Avenue  
Fayetteville, AR 72702

CPF No. 38518M

Dear Mr. Mann:

On November 17 - 21, 1997, representatives of the Central Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite safety inspection of your pipeline facilities and records for Razorback Pipeline Company at Rogers, Arkansas.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of the pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195. The items inspected and the probable violations are:

#### **§195.402 Procedural Manual for Operations, Maintenance and Emergencies.**

**§195.402(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in §195.402(c), §195.402(d), and §195.402(e).**

Review of Razorback Pipeline Company's Operations and Maintenance procedural manual found the procedures were inadequate. The procedures need expansion to include additional detail about the following items, as reviewed with your personnel during the inspection:

**1. §195.402(c) - Maintenance and normal operations.**

- a. The hydrostatic testing procedures did not include provisions for the documentation of discontinuities, test failures, and other abnormalities shown on the pressure chart. In addition, the procedures did not include provisions that an elevation profile of the test segment is required when the elevation difference is greater than 100' as required by 195.310(b)(9).
- b. The abandonment of facilities procedures did not include provisions for the parameters that should be considered when developing an abandonment plan as required by 195.402(c)(10).
- c. The procedures regarding accidental ignition did not include provisions regarding the use of fire fighting equipment, as appropriate, for the work being performed as required by 195.402(c)(11).
- d. The welding procedures did not include provisions for pipe smaller than 2d" in diameter as required by 195.214. In addition, the existing welding procedures (#3, #4, and #5) have administrative errors that need to be corrected.
- e. The cathodic protection procedures did not include provisions for the replacement of a crossing when a leak is discovered during monitoring of a shorted casing.
- f. The cathodic protection procedures did not include provisions for the necessary remedial actions that should be taken for deficiencies noted during monitoring, specifically low potential.
- g. The internal corrosion procedures did not include provisions to clarify the situations when the use of a full sole repair would be allowed and when replacement of the pipe would be required.

**2. §195.402(d) - Abnormal operation.**

- a. The procedural manual did not include provisions for loss of communications during abnormal operations.

**3. §195.402(e) - Emergencies.**

- a. The procedural manual did not include a listing of the immediate response areas for the Razorback System.

As provided in 49 C.F.R. §190.237, this Notice of Amendment serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. § 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this Notice. If you do not wish to contest this Notice of Amendment, you may provide your revised procedures within 30 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. § 190.237.

Thank you again for your cooperation. If you have any questions in regard to this matter, please contact me at 816-426-2654.

Sincerely,

Ivan A. Huntoon  
Director, Central Region  
Office of Pipeline Safety